

**IN THE UNITED STATES DISTRICT  
COURT EASTERN DISTRICT OF  
TEXAS MARSHALL DIVISION**

CYWEE GROUP LTD.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	2:17-cv-00495-WCB-RSP
HUAWEI DEVICE CO. LTD.,	)	
HUAWEI DEVICE (DONGGUAN)	)	<b>JURY TRIAL DEMANDED</b>
CO. LTD., AND HUAWEI DEVICE	)	
USA, INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS’ MOTION FOR ISSUANCE  
OF LETTER OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE**

Under the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970, and 28 U.S.C. § 1781, defendants Huawei Device Co. Ltd., Huawei Device (Dongguan) Co. Ltd., and Huawei Device USA, Inc. move for issuance of a Letter of Request for International Judicial Assistance to the Appropriate Judicial Authority of the Netherlands, requesting Xsens Technologies B.V. (“Xsens”) to produce relevant documents to this litigation.

Defendants submit that the requested documents are necessary and in the interest of justice, that defendants cannot serve Xsens by subpoena within the United States, and that defendants cannot directly compel Xsens to produce documents in the United States. Furthermore, defendants seek discovery relevant to its defenses to claims of patent infringement by plaintiff CyWee Group Ltd.

Therefore, defendants request that this Court grant this motion and issue the proposed Letter of Request for International Judicial Assistance attached as Exhibit 1, bearing an original

signature by the Court and original seal affixed by the clerk of the Court. Defendants make these specific requests to comply with the requirements for service in the Netherlands.

Date: July 5, 2018

Respectfully submitted,

/s/ J. Mark Mann

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Huawei Device (Dongguan) Co. Ltd., and Huawei  
Device USA, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on July 5, 2018, I served the foregoing by notice of electronic filing on counsel of record registered as CM/ECF users.

/s/ J. Mark Mann  
J. Mark Mann